

### REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed August 16, 2006. Applicant respectfully requests reconsideration and favorable action in this case.

### Claim Status

Claims 1-3, 6-8, 10-15, 19-20 and 22-24 were pending. Claims 1-3, 6-8, 10-15, 19-20 and 22-24 were rejected. Claims 25-33 are new. No new matter is added: support for the new claims can be found in paragraphs 0013, 0023, 0026 and 0036 of the specification. Through these changes, Claims 1-3, 6-8, 10-15, 19-20 and 22-33 are pending.

### Rejections Under 103

Claims 1-3, 6-8, 10-13, 15, 19-20 and 22-24 stand rejected as anticipated by U.S. Patent No. 6,343,324 ("Hubis") in view of U.S. Publication No. 2004/0186881 ("Porter").

Claim 14 stands stand rejected as anticipated by U.S. Patent No. 6,343,324 ("Hubis") in view of U.S. Publication No. 2004/0186881 ("Porter") and further in view of U.S. Publication No. 2001/0020254 ("Blumenau").

### **Claims 1 and 13 are Nonobvious in Light of Hubis and Porter**

Applicant respectfully submits that Claims 1 and 13 are nonobvious in light of Hubis and Porter. In order to establish a prima facie case of obviousness, the Examiner must show: that the prior art references teach or suggest all of the claim limitations; that there is some suggestion or motivation in the references (or within the knowledge of one of ordinary skill in the art) to modify or combine the references; and that there is a reasonable expectation of success. M.P.E.P. 2142, 2143; In re Vaeck, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). The Examiner must explain with reasonable specificity at least one rejection – otherwise, the Examiner has failed procedurally to establish a prima facie case of obviousness. M.P.E.P. 2142; Ex parte Blanc, 13 U.S.P.Q.2d 1383 (Bd. Pat Application. & Inter. 1989). When the motivation to combine the teachings of the references is not immediately apparent, it is the duty of the Examiner to explain why the combination of the teachings is proper. Ex Parte Skinner, 2 U.S.P.Q.2d 1788, 1790 (Bd. Pat. App. & Inter. 1986). Applicant respectfully submits that Hubis and Porter provide no suggestion or motivation to combine the cited references to include a

processor configured to access a mapping according to “a username and a corresponding password” and therefore do not provide sufficient basis for a prima facie case of obviousness.

Claim 1 recites:

A system comprising:  
an interface to an IP network;  
an interface to one or more target devices;  
a processor coupled to the interfaces; and  
a memory;  
wherein the processor is configured  
to maintain in the memory a mapping of users that are connected to the IP  
network to the one or more target devices,  
to access the mapping according to login information corresponding to the users,  
the login information comprising a username and a corresponding  
password associated with each user, and  
to enable access from the users to the one or more target devices according to  
the mapping; and  
wherein communications between the users and the processor comprise NDMP  
communications.

Thus, Claim 1 teaches: “to access the mapping according to login information corresponding to the users, the login information comprising a username and a corresponding password associated with each user, and to enable access from the users to the one or more target devices according to the mapping.” Claim 13 contains similar claim language. The mapping is accessed according to both username and password such that the user associated with a particular username and password can have access to specified target devices as determined by the mapping. Thus, based upon a user’s username and password, via a mapping, a user is given access to specific devices.

By contrast, the only reference to a username and password in Porter is the passing reference: “prompting a user to supply an NDMP username and password.” See Porter, paragraph 0042. This reference appears to be in the context of determining “the type of a host” (e.g. determining “if the host is NDMP-configured”). Applicant respectfully submits that this merely demonstrates that usernames and corresponding passwords exist in an NDMP environment. There is no mention or suggestion that NDMP passwords can or could successfully be used for enabling a mapping and allowing access to a set of target devices. It is however, telling that while Porter does teach a username and password in an NDMP environment, the association between host and device in Porter is effected by user selection or device serial number and not a username and password. See Porter, paragraphs 0037 and 0040 and figure 10.

Likewise, the applicant has reviewed the cited portions of Hubis and has found no suggestion or motivation to use anything other than a WWN (which is a unique and static device identifier) to access a specific logical volume. Fibre Channel devices, such as those discussed in Hubis, have a unique WWN identifier that is fixed. See Hubis, generally and column 6, lines 34-45. There is no impetus or suggestion within Hubis to develop other mapping methods-in particular, the mapping method of the present invention which comprises using an NDMP username and corresponding password for enabling a mapping and allowing access to a set of target devices. If the Examiner disagrees, applicant respectfully requests the Examiner point out where a suggestion or motivation to use an NDMP username and corresponding password for enabling a mapping and allowing access to a set of target devices can be found.

Applicant respectfully submits that because Hubis and Porter provide no suggestion or motivation to combine the cited references, they do not provide sufficient basis for a prima facie case of obviousness. Accordingly, withdrawal of these rejections is respectfully requested.

For similar reasons to those set forth above, new Claims 25-33 are also submitted to be patentable over the prior art.

#### IDS REFERENCES

##### Consideration of References Cited in IDS

The Applicant filed an information disclosure statement (IDS) in the present application on April 11, 2006. Applicant notes that the Office Action was not accompanied by a copy of the listing of references (Form PTO SBO8 A and B ) submitted with this IDS, initialed by the Examiner to indicate that the references cited therein were considered. Therefore, the applicant respectfully request that the Examiner consider the references cited in this IDS and forward a copy of the initialed Form PTOSBO8 A and B to the applicant.


CONCLUSION

Applicant respectfully requests that the Examiner withdraw his rejections of Claims 1 and 13 and the respective dependant claims. Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-3, 6-8, 10-15, 19-20 and 22-33. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

**Sprinkle IP Law Group**  
Attorneys for Applicant



Attorney John L. Adair  
Reg. No. 48,828

Date: **November 16, 2006**

1301 W. 25<sup>th</sup> Street, Suite 408  
Austin, TX 78705  
Tel. (512) 637-9220  
Fax. (512) 371-9088